

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE CITY OF PHILADELPHIA, MAYOR AND
CITY COUNCIL OF BALTIMORE, THE BOARD
OF DIRECTORS OF THE SAN DIEGO
ASSOCIATION OF GOVERNMENTS, ACTING
AS THE SAN DIEGO COUNTY REGIONAL
TRANSPORTATION COMMISSION,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., BANC OF AMERICA
SECURITIES LLC, MERRILL LYNCH, PIERCE,
FENNER & SMITH INCORPORATED,
BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., CITIGROUP INC., CITIBANK N.A.,
CITIGROUP GLOBAL MARKETS INC.,
CITIGROUP GLOBAL MARKETS LIMITED,
GOLDMAN SACHS & CO. LLC, JPMORGAN
CHASE & CO., JPMORGAN CHASE BANK, N.A.,
J.P. MORGAN SECURITIES LLC, MORGAN
STANLEY, MORGAN STANLEY SMITH
BARNEY LLC, MORGAN STANLEY & CO. LLC,
MORGAN STANLEY CAPITAL GROUP INC.,
THE ROYAL BANK OF CANADA, RBC
CAPITAL MARKETS LLC, WELLS FARGO &
CO., WELLS FARGO BANK, N.A., WACHOVIA
BANK, N.A., WELLS FARGO FUNDS
MANAGEMENT, LLC, WELLS FARGO
SECURITIES LLC,

Defendants.

Case No. 19-cv-1608 (JMF)

**STIPULATION AND ~~PROPOSED~~ ORDER REGARDING
DISCOVERY SCHEDULE**

WHEREAS, the parties to the above-captioned action have been working in good
faith to proceed with discovery in accordance with the current case schedule;

WHEREAS, discovery has required coordinating with and accommodating the schedules of non-parties and former employees of parties;

WHEREAS, illness of witnesses and/or counsel, including due to the COVID-19 pandemic, has required multiple depositions to be cancelled and rescheduled;

WHEREAS, the parties have served written discovery requests that cannot be fully responded to until depositions have concluded;

WHEREAS, the parties wish to move this matter forward while avoiding prejudice to either side;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. No further party depositions will be noticed.

2. The deadline for noticing any non-party deposition will be June 30, 2022.

Notwithstanding this, any party will have three business days from the date of receiving service of a notice of non-party deposition to cross-notice that deposition, even if that results in the cross-notice being served after June 30.

3. The deadline for the completion of fact discovery is extended by 45 days, to August 15, 2022.

4. The deadline for serving party discovery requests, including Interrogatories, Requests for Admission, and Requests for Production, has already passed and will not be extended. The deadline for responding to Interrogatories and Requests for Admission served on May 25, 2022, will be extended to August 31, 2022.

5. The deadlines in the schedule not addressed in the paragraphs set forth above remain unchanged.

DATED: New York, New York
June 10, 2022

[Signatures added by consent]

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Application GRANTED. The parties are reminded that any agreement to extend the deadline for fact or expert discovery in this case has no effect until ordered by the Court. Further extension requests are unlikely to be granted. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. Paul Jones", is written over the date.

June 13, 2022

IT IS SO ORDERED.

Dated: _____

HON. JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK